Exhibit A

The Parties' Proposed Constructions and Identification of Intrinsic/Extrinsic Evidence for United States Patent No. 8,709,494

Claim No.	Claim Term	Plaintiff's Proposed Constructions	Defendants' Proposed Constructions
9	laminated	This term is recited in the preamble. *See also Plaintiff's construction for "the layers are directly laminated to each other."*	formed by layering or uniting two or more layers Intrinsic Support: '494 Patent, Col 3, ll. 33-39; Provisional Patent Application No. 60/838,467, "Method and System for Preserving Amnion Tissue for Later Transplant," filed Aug. 17, 2006, p. 74; U.S. Patent Application No. 11/840,728, "Placental Tissue Grafts and Improved Methods of Preparing and Using the Same," filed Aug. 17, 2007, Col. 4, l. 28 – Col. 5, l. 2 Extrinsic Support: THE MERRIAM-WEBSTER DICTIONARY, 277 (New Ed. 2005); WO 93/10722 at 4:35-5:9, published June 10, 1992; Declaration of Daniel L. Mooradian, dated November 21, 2014.
9	a laminate	This term is recited in the preamble.	product formed by layering or uniting two or more layers Intrinsic Support: '494 Patent, Col. 8, ll. 52-55;

			Provisional Patent Application No. 60/838,467, "Method and System for Preserving Amnion Tissue for Later Transplant," filed Aug. 17, 2006, p. 74; U.S. Patent Application No. 11/840,728, "Placental Tissue Grafts and Improved Methods of Preparing and Using the Same," filed Aug. 17, 2007, Col. 4, l. 28 – Col. 5, l. 2 <u>Extrinsic Support:</u> THE MERRIAM-WEBSTER DICTIONARY, 277 (New Ed. 2005); WO 93/10722 at 4:35-5:9, published June 10, 1992; Declaration of Daniel L. Mooradian, dated November 21, 2014.
9	retains	*See Plaintiff's construction of phrase "at least one of said layers is an amnion layer which retains an epithelial cellular layer"*	continues to have <u>Extrinsic Support:</u> WEBSTER'S ENCYCLOPEDIC UNABRIDGED DICTIONARY OF THE ENGLISH LANGUAGE, P. 1643; Declaration of Daniel L. Mooradian, dated November 21, 2014.
9	epithelial cellular layer	*See Plaintiff's construction of phrase "at least one of said layers is an amnion layer which retains an epithelial cellular layer"*	a single layer of epithelial cells that are densely adherent to the basement membrane of amnion <u>Extrinsic Support:</u> G. Bourne, *The Foetal Membranes. A Review of the Anatomy of Normal Amnion and Chorion and Some Aspects of their Function*, 38 POSTGRAD MED J. 193 (1962); Declaration of Daniel L. Mooradian, dated November 21, 2014.
9	the layers are directly laminated to each	the amnion/chorion layer and amnion/chorion layer, as defined above, are adhered together	*See Defendants' construction of the phrase "laminated" hereinabove*

	other	*Intrinsic Evidence* The '494 patent in its entirety, including without limitation: • Abstract; • Col. 1:19-22; • Col. 1:36-48; • Col. 2:15-39; • Col. 2:45-55; • Col. 3:33-39; • Col. 4:55-col. 5:3; • Col. 5:55-col. 7:10; • Col. 8:51-col. 9:18; • Col. 10:36-51; and • Col. 10:61-col. 11:30. The '494 patent file history in its entirety, including without limitation: • Preliminary Amendment dated July 29, 2013; • Office Action dated October 11, 2013; • Amendment dated January 13, 2014; *See, e.g.*, pp. 5-6; • *See generally*, file history of U.S. Patent No. 8,372,437; and • *See generally*, U.S. Provisional Application No. 60/838,467. *See, e.g.*, SB-0430-M; SB-0400-M; ; SB-F0460; Amnion Video Text; AM Processing; SB Tissue Process and Process Features; videos cited therein.	

		Extrinsic Evidence • Expert opinion of Rebecca N. Baergen, M.D.	
9	at least one of said layers is an amnion layer which retains an epithelial cellular layer	at least one of the amnion layers retains a sufficient amount of epithelial cells to support the desired purpose of the tissue graft *Intrinsic Evidence* The '494 patent in its entirety, including without limitation: • Abstract; • Col. 1:19-22; • Col. 1:36-48; • Col. 2:15-39; • Col. 2:45-55; • Col. 4:55-col. 5:3; • Col. 5:55-col. 7:10; • Col. 7:13-56; and • Col. 10:61-col. 11:30. The '494 patent file history in its entirety, including without limitation: • Preliminary Amendment dated July 29, 2013. *See, e.g.*, p. 10; • Office Action dated October 11, 2013; • Amendment dated January 13, 2014; *See, e.g.*, pp. 5-6; • *See generally*, file history of U.S. Patent No. 8,372,437; and • *See generally*, U.S. Provisional Application No. 60/838,467. *See, e.g.*,	*See Defendants' construction of the phrases "retains" and "epithelial cellular layer"*

		SB-0430-M; SB-0400-M; ; SB-F0460; Amnion Video Text; AM Processing; SB Tissue Process and Process Features; videos cited therein. <u>Extrinsic Evidence</u> • Expert opinion of Rebecca N. Baergen, M.D.	
9	amnion layers	amnion layer separated from chorion layer of native placenta <u>*Intrinsic Evidence:*</u> The '494 patent in its entirety, including without limitation: • Abstract; • Col. 1:19-22; • Col. 1:36-48; • Col. 2:14-39; • Col. 2:45-55; • Col. 3:10-13; • Col. 4:55-col. 5:3; • Col. 5:55-col. 7:10; and • Col. 10:61-col. 11:30. The '494 patent file history in its entirety, including without limitation: • Preliminary Amendment dated July 29, 2013. *See, e.g.*, p. 10; • Office Action dated October 11, 2013; • Amendment dated January 13, 2014; *See, e.g.*, pp. 5-6; • *See generally*, file history of U.S. Patent	one of the fetal membranes comprising an epithelial layer, basement membrane, compact layer, fibroblast layer and the spongy layer <u>Extrinsic Support:</u> G. Bourne, *The Foetal Membranes. A Review of the Anatomy of Normal Amnion and Chorion and Some Aspects of their Function*, 38 POSTGRAD MED J. 193 (1962); Declaration of Daniel L. Mooradian, dated November 21, 2014.

		No. 8,372,437; and • *See generally*, U.S. Provisional Application No. 60/838,467. *See, e.g.*, SB-0430-M; SB-0400-M; ; SB-F0460; Amnion Video Text; AM Processing; SB Tissue Process and Process Features; videos cited therein <u>Extrinsic Evidence:</u> • Expert opinion of Rebecca N. Baergen, M.D. • Rebecca N. Baergen, MANUAL OF BEIRSCHKE AND KAUFMAN'S PATHOLOGY OF THE HUMAN PLACENTA 6 (Springer 2005) (*see, e.g.*, pp. 88-89); • Kurt Benirschke, Peter Kaufman, PATHOLOGY OF THE HUMAN PLACENTA 11 (4th ed. Springer 2000) (*see, e.g.*, pp. 284-294); • Malak *et al.*, 1994, *Br. J. Obst. & Gyn.* (*see, e.g.*, p. 377-379); • Bourne *et al.*, 1960, *Am. J. Obst & Gyn.*, 79(6):1070-1073; • Bourne *et al.*, 1962, *Postgrad. Med. J.*, 38:193-201 (*see, e.g.*, p. 194); • Parry *et al.*, 1998, *New England J. Med.*, 338(10) 663-670 (*see, e.g.*, pp. 663-664); • Bourne, 1966, *Proceedings Royal Society of Med.*, 59:1127-28; • Ockleford *et al.*, 1993, *Phil. Trans R. Soc. Lond.*, 342:121-136 (*see, e.g.*, pp. 130-135);	

		• *See generally*, B. Young & J. Wheath, WHEATER'S FUNCTIONAL HISTOLOGY 1, 2, 4, 19 (4th ed. Harcourt Publishers Ltd. 2000) (*see, e.g.*, p. 367).	
9	chorion layers	chorion layer separated from amnion layer of native placenta *Intrinsic Evidence:* The '494 patent in its entirety, including without limitation: • Abstract; • Col. 1:19-22; • Col. 1:36-48; • Col. 2:15-39; • Col. 2:45-55; • Col. 4:55-col. 5:3; • Col. 5:55-col. 7:10; and • Col. 10:61-col. 11:30. The '494 patent file history in its entirety, including without limitation: • Preliminary Amendment dated July 29, 2013. *See, e.g.*, p. 10; • Office Action dated October 11, 2013; • Amendment dated January 13, 2014; *See, e.g.*, pp. 5-6; • *See generally*, file history of U.S. Patent No. 8,372,437; and • *See generally*, U.S. Provisional Application No. 60/838,467. *See, e.g.*, SB-0430-M; SB-0400-M; ; SB-F0460; Amnion Video Text; AM Processing; SB	one of the fetal membranes comprising a cellular layer, reticular layer, a pseudo-basement membrane and the trophoblast layer Extrinsic Support: G. Bourne, *The Foetal Membranes. A Review of the Anatomy of Normal Amnion and Chorion and Some Aspects of their Function*, 38 POSTGRAD MED J. 193 (1962); Declaration of Daniel L. Mooradian, dated November 21, 2014.

		Tissue Process and Process Features; videos cited therein. <u>Extrinsic Evidence:</u> • Expert opinion of Rebecca N. Baergen, M.D. • Rebecca N. Baergen, Manual of Beirschke and Kaufman's Pathology of the Human Placenta 6 (Springer 2005) (*see, e.g.*, pp. 88-92); • Kurt Benirschke, Peter Kaufman, Pathology of the Human Placenta 11 (4th ed. Springer 2000) (*see, e.g.*, pp. 294-297); • Malak *et al.*, 1994, *Br. J. Obst. & Gyn.* (*see, e.g.*, p. 377-379); • Bourne *et al.*, 1960, *Am. J. Obst & Gyn.*, 79(6):1070-1073; • Bourne *et al.*, 1962, *Postgrad. Med. J.*, 38:193-201 (*see, e.g.*, p. 194); • Parry *et al.*, 1998, *New England J. Med.*, 338(10) 663-670 (*see, e.g.*, pp. 663-664); • Bourne, 1966, *Proceedings Royal Society of Med.*, 59:1127-28; • Ockleford *et al.*, 1993, *Phil. Trans R. Soc. Lond.*, 342:121-136 (*see, e.g.*, pp. 130-135); • *See generally*, B. Young & J. Wheath, Wheater's Functional Histology 1, 2, 4, 19 (4th ed. Harcourt Publishers Ltd. 2000) (*see, e.g.*, p. 367).	